

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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TERRENCE MOORE, AS TRUSTEES OF THE METAL  
LATHERS LOCAL 46 PENSION FUND, et al.,

Plaintiffs,

v.

NAVILLUS TILE, INC., D/B/A NAVILLUS  
CONTRACTING, ADVANCED CONSTRUCTION  
SOLUTIONS, LLC, D/B/A ACS-NY LLC, TIME  
SQUARE CONSTRUCTION, INC., DONAL  
O'SULLIVAN, KEVIN O'SULLIVAN, and HELEN  
O'SULLIVAN,

Defendants.

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**DEFENDANT ADVANCED  
CONTRACTING SOLUTIONS  
LLC'S STATEMENT IN  
COMPLIANCE WITH RULE 6  
OF JUDGE MCMAHON'S  
RULES GOVERNING  
ELECTRONIC DISCOVERY**

14 Civ. 8326 (CM)(JLC)

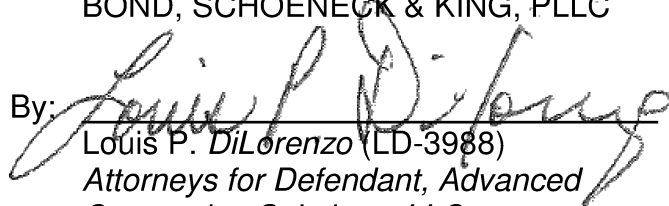
Defendant Advanced Contracting Solutions LLC ("ACS"), by and through their attorneys, Bond, Schoeneck & King, PLLC, hereby make, based on its reasonable investigation to date, the following statement in compliance with the Honorable Judge Colleen McMahon's Rules Governing Electronic Discovery:

- (1) The most likely custodians of e-mail and other electronic documents that may be relevant to this case have all received a memorandum instructing them not to delete, destroy, or alter any electronic documents in their client.
- (2) ACS's email hosting provider uses standard filtering algorithms and spam pattern detection to scan the contents of each message before it reaches the inbox to filter out spam and detect and protect against viruses.

Dated: New York, New York  
January 12, 2015

BOND, SCHOENECK & KING, PLLC

By:

A handwritten signature in dark ink, appearing to read "Louis P. DiLorenzo", is written over a horizontal line.

Louis P. DiLorenzo (LD-3988)

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